

SEAL

United States District Court

NORTHERN

DISTRICT OF

CALIFORNIA

UNITED STATES OF AMERICA

ORIGINAL
FILED

v.

Arthur Chester Orogo Balmes, (See - 8 2005)
Attachment A for remaining
defendants)

CRIMINAL COMPLAINT

CASE NUMBER:

3 05 70248

JL

(Name and Address of Defendant)

RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about Nov. 2003 to April 2005 in San Mateo county, in the Northern District of California defendant(s) did, (Track Statutory Language of Offense) knowingly and intentionally conspire to steal from any mail route any letter, postal card, package, bag, or mail

in violation of Title 18 United States Code, Section(s) 371 and 1708 (See Attachment B for Overt Acts)

I further state that I am a(n) Postal Inspector, USPS and that this complaint is based on the following facts:
Official Title

See Attached Affidavit of Craig Goldberg made a part hereof by this reference.

Penalties: Not more than 5 years imprisonment; not more than a \$250,000 fine; not more than 3 years of supervised release; mandatory special assessment of \$100; potential deportation

Process: No-bail arrest warrants for each named defendant.

Continued on the attached sheet and made a part hereof:

☒ Yes

☐ No

Approved
As To
Form

AUSA: Jeffrey Finigan

Name/Signature of Complainant:

Craig Goldberg

Sworn to before me and subscribed in my presence,

Date

4-8-05

at

S.F.

City and State

James Larson
United States Magistrate Judge

Name & Title of Judicial Officer

Signature of Judicial Officer

Attachment A

Leonardo Ugalde Briosos,

Rodolfo Ugalde Briosos,

Francis Arnel Ronas Maroto,

Rafael Martínez,

Douglas Quintana Meehleib ,

Gabriel Jose Navarrette,

Jesus Jose Navarro,

Arnel Tabangcura Salaver ,

Fetongi Mamahi Sanft,

Vaea Tangitau Sanft,

Sosaia Toviko Taelangi, and

Segundo Bendo Tiongco, Jr.,

Attachment B

Overt Acts

1. On February 21, 2005, **Arthur Balmes** stole a Sony Vaio laptop computer from the mail at NCA.
2. On or about February 19, 2005, **Leonardo Ugalde Briosos** stole mail at NCA.
3. On or about and between November 1, 2004 and March 2005, **Rodolfo Ugalde Briosos** acted as a lookout for a co-worker at NCA who was stealing mail at NCA.
4. On or about and between November 1, 2004 and March 2005, **Francis Arnel Ronas Maroto** acted as a lookout for a co-worker at NCA who was stealing mail at NCA.
5. On or about February 14, 2005, **Rafael Martinez** stole an IBM ThinkPad from the mail at NCA.
6. On or about and between November 2004 and December 2004, **Douglas Quintana Meehleib** stole laptop computers from the mail at NCA.
7. On or about February 12, 2005, **Gabriel Jose Navarrette** stole a camcorder and jewelry from the mail at NCA.
8. On or about February 4, 2005, **Jesus Jose Navarro**, stole an MP3 player and palm pilot from the mail at NCA.
9. On or about November, **Arnel Tabangcura Salaver** stole a laptop computer from the mail at NCA.
10. On or about February 11, 2005, **Fetongi Mamahi Sanft** stole a laptop computer from the mail at NCA.
11. On or about February 14, 2005, **Vaea Tangitau Sanft** stole computer parts from the mail

at NCA and asked a co-worker to be a lookout while he performed the theft.

12. On or about February 7, 2005, **Sosaia Toviko Taelangi** stole a computer monitor from the mail at NCA.
13. On or about February 7, 2005, **Segundo Bendo Tiongco, Jr.**, stole a leather jacket from the mail at NCA.

AFFIDAVIT

I, Craig I. Goldberg, a United States Postal Inspector with the United States Postal Inspection Service (USPIS), being duly sworn, state as follows:

1. I am a United States Postal Inspector employed by the San Francisco Division of the USPS and have been so employed for approximately one year. I am currently assigned to the Internal Crimes Mail Theft Team, which investigates the theft and mistreatment of U.S. Mail.
2. I have had the following education and training. I have received formal instruction from U.S. Postal Inspectors, Assistant United States Attorneys, and other law enforcement agents who have done extensive work in the areas of mail theft. I have received formal classroom training by the USPS. In December of 2004, I attended the USPS Internal Crimes Mail Theft training program in Potomac, MD. This training primarily focused on investigations of postal employees and contract employees responsible for the theft and mistreatment of U.S. Mail.
3. During my employment as a federal law enforcement officer over the last year, I have personally conducted or participated in numerous mail theft investigations. I have been the primary case agent on approximately twelve investigations and have investigated these cases from start to finish. I have conducted numerous interviews of suspects, witnesses, and victims. Based on my training and experience, I am familiar with the methods that individuals use to steal mail for the purpose of obtaining valuable merchandise.
4. I make this affidavit in support of a criminal complaint by the United States of America against the following individuals:
 - Arthur Chester Orogo Balmes,
 - Leonardo Ugalde Briosos,
 - Rodolfo Ugalde Briosos,
 - Francis Arnel Ronas Maroto,
 - Rafael Martinez,
 - Douglas Quintana Meehleib,
 - Gabriel Jose Navarrette,
 - Jesus Jose Navarro,
 - Arnel Tabangcura Salaver,
 - Fetongi Mamahi Sanft,
 - Vaea Tanqitau Sanft,

- Sosaia Toviko Tauelangi, and
- Segundo Bendo Tiongco, Jr.,

5. As set forth in this affidavit, I have probable cause to believe that the above-mentioned individuals committed Violations of Title 18 U.S. Code Section 1708, Theft or Receipt of Stolen Mail, and Title 18 U.S. Code Section 371, Conspiracy to do the same.

II. BACKGROUND: PROCESSING U.S. MAIL BOUND FOR U.S. MILITARY BASED IN OKINAWA

6. The facts in this affidavit are known to me as a result of my personal participation in this investigation or were related to me by other law enforcement officers and witnesses, either personally or by their reports.
7. The United States Postal Service (USPS) operates the International Service Center (ISC) in Daly City, California. The ISC is responsible for processing international mail, including outgoing mail destined for U.S. military personnel serving in certain overseas locations. Almost all U.S. Mail addressed to military postal customers in Okinawa, Japan is processed at the ISC and designated military mail.
8. Military mail destined for Okinawa can be broken down into three primary categories: letter mail (typically written correspondence and other documents), small parcels (typically small merchandise such as a jewelry box), and large parcels (typically larger merchandise such as a laptop computer). USPS requires each sender of an Okinawa-bound parcel to complete a customs declaration form, which states the contents of the parcel and corresponding value of those contents. The customs declaration form is then affixed to the outside of the parcel, which results in anyone handling the parcel being able to see what contents are inside the package.
9. Letter mail and small parcels are typically put into mail sacks and sealed for security by USPS mail handlers at the ISC. Those sacks are then loaded into large metal air cargo containers. Due to their size, large parcels cannot be placed in sacks and are handled one of two ways. One way involves large parcels being placed directly into the air cargo containers with the sacks of letter mail and small parcels. The second way involves the large parcels being placed in metal "Over The Road" (OTR) containers, which are USPS rolling carts used to transport mail.
10. The air cargo containers and OTRs are then trucked to a warehouse facility operated by Nippon Cargo Airlines (NCA), a Japanese airline located at 900 North Access Road at the San Francisco International Airport in the Northern District of California. NCA is the primary air carrier of Okinawa-bound U.S.

military mail. Upon arrival at NCA, the air cargo containers and OTRs are offloaded from the truck by NCA cargo handlers, who are actually employed by Aeroground, Inc., a company that provides cargo employee staffing to many different airlines at San Francisco International Airport.

11. After being unloaded from the truck, the air cargo containers are stored in the NCA warehouse until they are subsequently loaded onto a NCA cargo plane for transport to Japan. Oftentimes, the cargo container that arrives at NCA from the ISC is too large for the NCA plane, so NCA cargo handlers must first "break down" the container, which entails each mail sack and large parcel being physically moved from the large air cargo container to a smaller air cargo container. In addition, any parcels that arrive at NCA in OTRs must be physically removed from the OTRs and stacked on a pallet by NCA cargo handlers. That pallet is then secured and loaded onto an NCA plane for transport to Japan. Currently, there are approximately 80,000 military personnel and dependents stationed in Okinawa. NCA cargo handlers handle almost all mail sent to these postal customers.

III. FACTS

A. THEFTS FROM U.S. MAIL BOUND FOR OKINAWA AND MEANS OF INVESTIGATING SAID THEFTS

12. From approximately November 2003 through the present date, there have been over 570 reported incidents of mail being received by Okinawa military postal customers with contents missing. The estimated dollar value of reported missing mail merchandise is approximately \$200,000. The majority of the reported cases involved small and large parcels. The volume of reported mail losses was particularly high around December 2003/January 2004 and December 2004/January 2005. Mail volume was high during these months due to the winter holiday season. A common theme among many of the reported losses is that the rifled parcels appeared to the victims to have been re-taped in order to conceal evidence of tampering.
13. With assistance from U.S. military criminal investigators in Okinawa, I have been actively investigating these reported losses. While conducting surveillance of the NCA parking lot in December 2004 and January 2005, I observed suspicious behavior being exhibited by NCA workers, including exchange of merchandise for cash and concealment of merchandise under clothing and in bags being carried from the NCA warehouse to personal vehicles parked in the adjoining parking lot.
14. Suspicious activity among NCA workers was also observed taking place inside the NCA warehouse, including unusually focused attention being given to reading

customs declaration forms attached to parcels and NCA workers appearing to serve as "lookouts" while co-workers spent unusually large periods of time inside air cargo containers full of mail. On one occasion, an NCA cargo handler was seen taking a roll of tape into an air cargo container full of mail, while a co-worker appeared to "stand guard." During surveillance of the NCA parking lot and warehouse in December 2004 and January 2005, I made video recordings of the suspicious activities observed. Based on the surveillance conducted, I identified NCA as the most likely location where the military mail losses were occurring.

15. In January 2005, I contacted an NCA cargo handler who I suspected of stealing military mail. The suspect admitted to stealing mail since around November 2003 and provided me with the names of numerous NCA co-workers (including the defendants named herein) who were also stealing from the U.S. mail, most of whom the suspect said had been stealing for as long a period of time as he had, if not longer. The suspect told me that some of the people stealing mail at NCA worked the swing shift (afternoon/evening) while others worked the graveyard shift (evening/early morning). The suspect also advised me that the workers on the different shifts participating in the thefts knew of the thefts occurring on each other's shifts and at least one worker, Jesus Jose Navarro, has been assigned to both shifts and worked with the others named herein in performing the thefts described herein. This suspect agreed to cooperate in this investigation by serving as a confidential informant (CI). The CI has no criminal record and the only promise that I have made to the CI is that I will advise the United States Attorney's Office of the CI's cooperation. While working with the CI over the course of this investigation, I have found the CI to be reliable and credible by corroborating much of his information through an undercover officer and through video and audio recordings.
16. The CI works the swing shift at NCA. In January 2005, I identified the CI as the person in a Target store surveillance video making purchases with a stolen Charter One Bank gift card (# 5107362487617636). The \$200 gift card had been mailed from New York to a U.S. soldier stationed in Okinawa. I interviewed the CI, who admitted to stealing the gift card and other mail since around November 2003.
17. After interviewing the CI, Inspectors Bernie Saluta, Chad Campbell and I accompanied the CI back to the CI's residence, where the CI voluntarily turned over to me various items that he admitted to stealing from U.S. mail including:
 - One Toshiba laptop computer S/N # Y2047304C
 - One KICKER KX400.1 Amplifier S/N # 000000202-239
 - One XBOX console w/ two controllers S/N # 240278543806
 - One Audiobahn 600 watt Subwoofer
 - CyberHome Mini DVD Player S/N # 461AAA9B002798
 - Three boxes of low-value jewelry
 - One box of Hugo Boss bath products

- Apex Portable DVD Player S/N # EX412058064
- Box set of 4 WWII movie DVDs
- Box set of 3 "From Dusk till Dawn" Collection DVDs
- Box set of Seinfeld Seasons 1 & 2 DVDs
- Box set of Seinfeld Season 3 DVDs
- Box set of 3 "The Man With No Name Trilogy" DVDs
- Box set of 2 "Master and Commander" DVDs
- Box set of Third Season of CSI
- Tombstone DVD
- The Fugitive DVD
- A Christmas Story DVD
- Friday the 13th DVD
- Ron White DVD
- Dark City DVD
- The NeverEnding Story DVD
- 4 3-Disc packs of Nickelodeon DVDs
- 3 XBOX game DVDs
- One Advance SP Gameboy S/N # XU197277087
- Kodak 4.0 MP Easyshare Digital Camera S/N # KCDCE30802338
- 2 Nike sweatshirts

18. CI told me that he and his co-workers would read the customs forms attached to the outside of the U.S. mail parcels being handled at NCA. CI said they would look for attractive items to steal, including, but not limited to, laptop computers, DVDs, CDs, digital cameras, computer monitors, XBOX and PlayStation video game systems, jewelry, clothing (such as leather jackets and expensive athletic shoes), and gift cards.
19. CI said that after identifying parcels containing attractive merchandise, he and his co-workers would cut open the parcels, steal the contents, conceal the stolen items in their clothing, and then re-tape the parcels to conceal evidence of tampering. CI told me he and his co-workers would then carry the stolen merchandise, which was concealed under their clothing, to their personal vehicles located in the adjoining parking lot. CI said the empty, re-taped parcels were placed on a pallet or inside an air cargo container, which were subsequently flown to Japan. Parcels were not identified as being rifled with contents missing until received and opened by the addressees in Okinawa.
20. CI stated that it was common practice for he and his co-workers to point out to each other attractive mail merchandise to steal and common practice to serve as "lookouts" for one another so that the mail theft could be committed without anyone getting caught by supervisors or other NCA employees. CI also told me that multiple suspects would sometimes share the contents stolen from a particular mail parcel.

21. In addition, CI told me he and his co-workers would sometimes help each other carry out stolen merchandise from the NCA warehouse to personal vehicles parked in the adjoining parking lot. CI stated to me that some of his co-workers stole such high quantities of items at once and/or such large items that they would put the stolen merchandise in garbage bins inside the NCA facility and then use forklifts to take the garbage bins to the dumpster in the parking lot, where the stolen merchandise would then be recovered and transferred to their personal vehicles.
22. CI also told me that he and his co-workers would sometimes sell stolen mail merchandise to each other and/or trade stolen mail merchandise with each other. They would also sometimes arrange for co-workers to sell their stolen merchandise to a third party. For example, the CI assisted several of the defendants named herein by introducing them to an undercover officer who subsequently made several purchases of stolen items from the defendants. In addition, CI said he and his co-workers retained some of the stolen merchandise at their residences for their own personal use and sometimes gave or sold stolen mail merchandise to friends and family members. Lastly, the CI advised me that it was common knowledge and well known among all of the defendants named herein, as well as others working at NCA, that these thefts were occurring on an almost daily basis.
23. I interviewed a second suspect in March 2005. This suspect (CI #2) confessed to stealing mail and agreed to cooperate with the investigation. CI #2 corroborated the information that CI previously provided to me, including which employees at NCA were stealing mail, how the thefts were carried out, how the employees assisted one another in committing mail theft, and related matters. CI #2 has no criminal record and the only promise that I have made to CI #2 is that I will advise the United States Attorney's Office of the CI #2's cooperation.
24. CI #2 works the graveyard shift at NCA and admitted to stealing the following:
- Four used laptops (Dell, HP, Sony & one for kids)
 - Three new digital cameras (Gateway, Canon & HP)
 - One used portable DVD player
 - One new video camera
 - One disc man player
 - Three T-shirts
 - Five new watches (Casio and Fossil)
 - Two pairs of 14k earrings
 - Approximately 15 DVDs (new and used)
 - Approximately 20 CDs (used)
 - One car amplifier (currently installed in his vehicle)
 - One new leather jacket
 - Three pairs of shoes
 - One 14k necklace

- Two silver necklaces
- One Sony PlayStation with four games
- One wallet containing \$10 cash

25. CI #2 told me that he sent most of the stolen merchandise to the Philippines but still had at his house the portable DVD player, Dell laptop and leather jacket, which he subsequently turned over to me.
26. In addition, an undercover Postal Inspector (UC) was introduced into this case who developed evidence against multiple NCA workers. From February 4, 2005 through March 7, 2005, UC purchased stolen mail merchandise from nine different suspects named herein on a total of 17 different occasions.
27. Electronic surveillance was utilized throughout this investigation, which included the use of Eagle audio recorders, hand-held video recorders and Hawk audio and video equipment. CI and UC made audio and video recordings, including undercover purchases of stolen mail matter by UC and controlled buys of stolen mail matter by CI.
28. Audio and video recordings were also made of suspects cutting open mail parcels, stealing contents, sharing stolen matter, "looking out" for each other while thefts occurred, re-taping parcels to conceal evidence of tampering, helping each other carry stolen mail matter to the parking lot, openly discussing mail merchandise they had stolen, openly discussing attractive mail merchandise they had identified and planned to steal, pointing out "attractive" mail parcels to each other and talking to one another about the price for which they planned to sell certain items to UC.

B. EVIDENCE OF THEFTS BY INDIVIDUAL DEFENDANTS

29. **Arthur Chester Orogo Balmes** ("Balmes") works the swing shift at NCA. CI told me that Balmes steals mail and private cargo.
30. I observed Balmes in December 2004 through January 2005, exhibiting suspicious behavior in the NCA parking lot and inside the NCA warehouse, including exchanging merchandise with co-workers for cash, intently reading customs declaration forms attached to mail parcels, and carrying plastic bags containing unknown items from the NCA warehouse to his personal vehicle. On December 27, 2004, I observed Balmes take a roll of tape into an air cargo container full of mail. CI later confirmed that Balmes took the roll of tape into the air cargo container to re-tape parcels from which Balmes had stolen contents. CI said he served as the "lookout" for Balmes on that particular occasion.
31. On February 7, 2005, Balmes told CI that he wanted to sell a stolen digital camera to UC. CI also reported to me that day that Balmes, along with co-

workers Jesus Navarro and Gabriel Navarrette, stole tooth-whitening devices from cargo that evening.

32. On February 15, 2005, UC met Balmes in the NCA parking lot. Balmes opened the trunk of his car (CA license plate # 3RTP544) and showed UC stolen mail merchandise that he wanted to sell. UC subsequently paid Balmes \$540 to purchase three MuVo Slim audio players, an Olympus camera, a Compaq laptop, a Digital laptop, a Sealife Reefmaster underwater camera, a battery charger, a disk drive and various computer accessories.
33. The Digital laptop (S/N # 2U724D4437) that UC bought from Balmes was the same one that I had previously mailed as a controlled test package on December 15, 2004, to a military contact in Okinawa for purposes of attempting to identify where the military mail thefts were occurring. I personally loaded the parcel containing the laptop onto a truck that delivered mail to NCA on December 15, 2004. My military contact in Okinawa subsequently received the parcel, which was missing the laptop.
34. On February 21, 2005, CI reported to me that Balmes stole a Sony laptop earlier that evening from the mail. On February 22, 2005, CI reported that Balmes wanted to sell the laptop to UC later that night.
35. On February 22, 2005, UC met Balmes in the NCA parking lot. Balmes opened the trunk of his car (CA license plate # 3RTP544) and showed UC a stolen Sony Vaio laptop, which UC subsequently purchased for \$500 cash.
36. On February 28, 2005, CI called me to report that Balmes stole a laptop earlier that evening.
37. On March 4, 2005, Balmes cut open a mail parcel, looked through the contents of the parcel, and then re-taped the parcel.
38. **Leonardo Ugalde Briosos** ("L. Briosos") works the graveyard shift at NCA with his brother Rodolfo. CI told me that L. Briosos steals U.S. mail while working at NCA.
39. On February 9, 2005, I was notified that a \$20 Target gift card that I had mailed as a controlled test package on January 20, 2005, to a military contact in Okinawa, had been fraudulently used on February 6, 2005, at a Target store in Colma, CA. Target personnel provided me with a videotape of the person using the gift card. The person, an Asian female, strongly resembled the DMV photo of a relative of Leonardo and Rodolfo Briosos who resides with them in Daly City, CA.

40. On February 18, 2005, CI and L. Briosos discussed merchandise that L. Briosos had stolen from the mail in 2004, including a watch, laptop and other electronic items, which L. Briosos stated he had subsequently sent to the Philippines.
41. On February 21, 2005, CI reported to me that while working on Saturday, February 19, 2005, he saw L. Briosos cut open a yellow mail sack that was sealed, take out a brown envelope from the sack and then place the envelope in his pocket.
42. On the evening of February 21, 2005, CI asked L. Briosos about the mail he had seen him steal from the yellow mail sack. L. Briosos told CI that the contents ended up being a coupon, medication and church items. L. Briosos told CI that he even cut his hand while reaching inside the mail sack and stated, "There are no good items to find anymore since the holiday is over."
43. On March 25, 2005, I interviewed CI #2, who told me that as far as he knew, L. Briosos had started stealing around the same time as he had (November 2004). CI #2 said that while serving as a lookout for L. Briosos, he saw L. Briosos cut open a sealed yellow mail sack and steal a small parcel containing a pair of earrings. CI #2 said L. Briosos placed the parcel under his jacket. CI #2 said he also heard from co-workers about other occasions on which L. Briosos had cut open mail sacks and stolen mail.
44. CI #2 told me that L. Briosos had also stolen a digital camera from the mail and showed it to him after he had taken it out of the parcel. CI #2 said L. Briosos had also showed him a ring and necklace that he had stolen from the mail. CI #2 also informed me that he was working with L. Briosos when they each stole watches from the same parcel along with other co-workers.
45. CI #2 stated that Leo Briosos told him that he had previously stolen a laptop. CI #2 also told me that he and other co-workers had served as lookouts for L. Briosos.
46. **Rodolfo Ugalde Briosos** ("R. Briosos") works the graveyard shift at NCA with his brother Leonardo. CI told me that R. Briosos steals U.S. mail while working at NCA.
47. On February 18, 2005, CI and R. Briosos discussed merchandise that R. Briosos had previously stolen from the mail, including electronic items such as portable DVD players and laptops. R. Briosos told CI that he had sent much of the stolen mail merchandise to the Philippines but that he still had at his house an HP Pavilion laptop.
48. On March 25, 2005, I interviewed CI #2, who told me that R. Briosos was stealing mail as of the time CI #2 started stealing, which was November 2004. CI #2 said he sometimes served as a lookout for R. Briosos and saw him steal a laptop,

portable DVD player, and projector. CI #2 said he also saw R. Briosos cut open a sealed yellow mail sack and steal a pair of earrings. CI #2 told me that R. Briosos had also stolen five watches from the same parcel from which CI #2 and other co-workers had stolen watches.

49. CI #2 told me he heard from his co-workers that R. Briosos had also stolen shoes and a digital camera from the mail. CI #2 said he witnessed R. Briosos hiding stolen mail matter under his jacket and taking the items to his personal vehicle. CI #2 stated that R. Briosos had served as a lookout for him as well as for other co-workers.

50. **Francis Arnel Ronas Maroto** ("Maroto") is a load planner who works the graveyard shift in the office at NCA. CI told me that Maroto has stolen merchandise from the mail on several occasions.

51. On February 21, 2005, CI talked to a co-worker about a projector that Maroto had previously stolen from the mail. The co-worker told CI that Maroto had told him that the projector was small in size. This same co-worker also told CI that "Graveyard shift employees work the mail everyday," which meant they looked to steal and/or stole from the mail every day.

52. On February 22, 2005, CI asked Maroto about a projector, XBOX and laptop that Maroto had previously stolen from the mail. Maroto laughed and did not deny stealing merchandise from the mail.

53. On March 25, 2005, I interviewed CI #2, who told me that Maroto worked in the NCA office, did not steal as much as the rest of the graveyard shift, and only came into the warehouse when there was mail present. CI #2 said he saw Maroto steal an XBOX from the mail and then heard Maroto ask co-worker Doug Meehleib to take the XBOX out to the parking lot for him.

54. CI #2 told me that he also heard that Maroto had stolen a projector and that Meehleib sold a pair of stolen shoes to Maroto. CI #2 told me Maroto served as a lookout for him as well as for Meehleib.

55. **Rafael Martinez** ("Martinez"), is a cargo handler who until recently worked the swing shift at NCA. CI told me that Martinez has stolen a significant amount of mail while working at NCA.

56. On February 4, 2005, co-worker Jesus Navarro told CI that Martinez had stolen two speakers from the mail the previous night. On February 7, 2005, CI reported to Postal Inspectors that Martinez wanted to sell stolen mail merchandise to UC. On February 8, 2005, UC met Martinez in the parking lot at NCA. Martinez showed UC stolen mail merchandise including one Asahi Pentax K1000 camera with tripod, film and accessories, one Sealife Reefmaster underwater camera, one package of "All in Wonder 9800 Pro" hardware and software, one camera

lens, one wireless notebook adapter, one Sony Walkman, and one wireless broadband router. UC purchased these items from Martinez for \$300 cash.

57. On February 14, 2005, CI called me to report that Martinez had stolen an IBM laptop the previous week. On February 15, 2005, UC called Martinez to discuss buying merchandise. Martinez told UC to come to NCA that evening to purchase merchandise from him as well as from his co-workers who had laptops to sell.
58. On February 18, 2005, CI reported to me that while cleaning his house, he found 18 unused AT&T prepaid phone cards that were originally part of a much larger batch of phone cards that Martinez and co-worker Vaea Sanft had stolen from the mail around November or December 2004. CI reported that Martinez had stolen approximately 1,000 phone cards. Using the serial number on one of the cards, I was able to determine that the calling cards were issued by AT&T as part of the USO Operation Phone Home program.
59. On February 23, 2005, UC and CI met with Martinez in the McDonalds parking lot on S. Airport Blvd. near NCA. Martinez drove into the McDonalds parking lot (CA license plate # 1NQN096), parked next to UC's vehicle, opened his trunk, and showed UC and CI stolen mail matter including an IBM computer keyboard, IBM ThinkPad, and black Targus notebook case containing a mobile docking station, network cable and two printer cartridges. UC bought the merchandise from Martinez for \$300 cash. Martinez talked to UC and CI about stealing mail, and when CI commented that there was new merchandise to get from the mail, Martinez responded "Yeah, if you're lucky."
60. **Douglas Quintana Meehleib** ("Meehleib") is a supervisor who works the graveyard shift at NCA. CI told me that Meehleib has stolen mail while working at NCA.
61. On February 22, 2005, CI and Meehleib discussed items that Meehleib had stolen from the mail. Meehleib commented that since he had recently been promoted to supervisor, he could no longer steal. However, Meehleib told CI that others could continue to steal and should be careful, particularly around new employees who could be "plants." Meehleib admitted to CI that he had stolen shoes from the mail, some of which he wore and some of which he sent to the Philippines. Other stolen items were also discussed, including a laptop that Meehleib said he kept in his bedroom.
62. On March 25, 2005, I interviewed CI #2, who told me that since November 2004, Meehleib was the graveyard shift employee who had stolen the highest quantity of mail matter. CI #2 said Meehleib recommended to him that he re-tape boxes after stealing mail merchandise in order to conceal the fact that the contents had been stolen. CI #2 said Meehleib would steal from large parcels and would also cut open sealed yellow mail sacks and steal from smaller parcels contained inside.

63. CI #2 told me that he had purchased two pairs of stolen shoes from Meehleib. CI #2 said Meehleib had stolen the shoes from the mail at NCA. CI #2 said he paid Meehleib \$70 for a pair of Nike Shox shoes and \$60 for a pair of Nike Jordan shoes.
64. CI #2 also told me that he saw Meehleib steal three brand new laptops from the mail on three separate occasions around November/December 2004. CI #2 said Meehleib asked him to serve as a lookout while he stole the laptops and explained that Meehleib used a razorblade or ballpoint pen to cut open each parcel and then took the laptop out of the box and concealed it under his jacket. CI #2 said Meehleib then re-taped the parcel and walked out to the parking lot and placed the laptop in his personal vehicle.
65. CI #2 said he also witnessed Meehleib steal three pairs of shoes (in addition to the two pairs Meehleib sold to him), Victoria's Secret merchandise and a Canon digital camera. CI #2 informed me that Meehleib also stole a computer monitor and had it hidden under his jacket before taking it to his car. CI #2 said Meehleib later commented to him that he almost got caught stealing the monitor.
66. CI #2 also stated that one time Meehleib opened a mail parcel containing watches and that Meehleib, CI #2, and three other co-workers each stole five watches from the box. CI #2 said that he remembered at least three other occasions on which Meehleib discussed stealing Victoria's Secret merchandise. CI #2 said that Meehleib was promoted to supervisor in early 2005 and according to co-workers had stolen a Dell laptop and a DVD player since being promoted.
67. **Gabriel Jose Navarrette** ("Navarrette"), is a customer service agent who works in the office at NCA. CI told me that Navarrette would oftentimes walk from the office into the warehouse when mail was received so that he could steal mail merchandise as well as cargo.
68. On February 5, 2005, I received a telephone call from CI informing me that Navarrette and a co-worker had stolen a projector and DVD game earlier that evening. CI said he witnessed the co-worker and Navarrette putting the stolen items in a garbage can and then using a forklift to take the garbage can outside to the parking lot dumpster. CI said the stolen items were then recovered from the garbage can and placed in a vehicle.
69. On February 7, 2005, CI reported to me that Navarrette, along with two co-workers, stole tooth-whitening devices from cargo that evening.
70. On February 12, 2005, CI called me to report that Navarrette had stolen a camcorder and two rings from the mail. CI said he obtained as evidence one of the copies of the customs declaration form that was attached to the parcel from

which Navarrette had stolen the camcorder. CI said Navarrette agreed to sell the camcorder and split the proceeds with CI.

71. On February 15, 2005, CI gave me a silver ring that Navarrette had stolen from the mail on February 12, 2005. According to CI, Navarrette stole two rings and gave one to CI. CI also gave me a copy of Customs Declaration and Dispatch Note # CP642799870US associated with the Panasonic camcorder that Navarrette stole from the mail on February 12, 2005. CI obtained the customs form from the parcel from which Navarrette had stolen the camcorder. Per the customs form, the camcorder had been mailed to Mona Adams, PSC 559 Box 6522, FPO AP 96377, which is a military address in Okinawa.
72. On February 15, 2005, Navarrette told CI that he planned to sell the stolen camcorder to UC. On February 15, 2005, UC met with Navarrette in the NCA parking lot. Navarrette showed UC a stolen Panasonic video camera and leather jacket, which UC purchased from Navarrette for \$250 and \$50, respectively.
73. On February 19, 2005, CI reported to me that Navarrette and a co-worker stole approximately 50-70 DVDs from a mailed parcel addressed to Kevin Borth (or Booth), (MAZ), US Navy, PSC 480 Box Security, FPO AP 96370, which is a military address in Okinawa. CI had written down the address that was on the parcel from which the DVDs had been stolen. CI reported that Navarrette gave him two of the stolen DVDs, which CI turned over to me as evidence.
74. **Jesus Jose Navarro** ("Navarro") works the swing shift at NCA. CI told me that Navarro steals mail and cargo. CI said Navarro was one of three NCA workers who had stolen the highest quantity of mail. CI also informed me that Navarro, who used to work graveyard shift and now works swing shift, was one of the people who "introduced" mail theft to the swing shift employees.
75. During surveillance that was conducted at NCA by Postal Inspectors and military investigators in December 2004, Navarro was observed exhibiting suspicious behavior in the NCA parking lot, including exchanging merchandise with co-workers for cash and storing a stolen XBOX in his vehicle (CA license plate # YFM476) before giving it to CI for a subsequent sale to another co-worker.
76. On January 28, 2005, Navarro told CI he had five MP3 players and commented that he and co-workers Chester Balmes and Vaea Sanft had stolen them. Navarro then sold the five MP3 players to CI for \$30 each (\$150 total). Inspector Bernie Saluta and I witnessed the transaction.
77. Also on January 28, 2005, Navarro talked to CI about he and other co-workers stealing "gold bars" from the mail, some of which were "gold-plated" and some that were "silver." These "gold and silver bars" stolen by Navarro were later determined by me to have been stolen from a parcel containing \$3,500 worth of collectible coins, silver proof notes and other collectible items from the

Washington Mint. According to a written statement provided by victim SFC Charles King who is stationed in Okinawa, he ordered the merchandise on January 18, 2005, and received email notification that the merchandise had been shipped to him on January 25, 2005. On February 25, 2005, King returned to Okinawa from a several week trip to the Philippines and went to the post office to retrieve the parcel containing the merchandise he had ordered from the Washington Mint. King described the parcel as being in "pretty bad shape" and said it had obviously been re-taped. King conducted an inventory of the contents of the parcel and reported that 9 pieces of merchandise, totaling approximately \$923, were missing from the parcel.

78. On March 2, 2005, I determined that a \$100 Silver Proof (Registration # 3758), which was one of the silver bars stolen by Navarro's co-worker Vaea Sanft and subsequently sold to CI on February 1, 2005, was stolen mail matter. According to Washington Mint President Tom Brokl, the Silver Proof that CI bought (Registration # 3758) was one of forty-five items mailed to Charles King on January 25, 2005.
79. On January 31, 2005, Navarro talked to CI about having stolen a DVD burner and amplifier.
80. On February 1, 2005, Navarro talked to CI about being \$300 short on his rent and therefore wanting to sell the stolen amplifier for \$350. Navarro also discussed stealing two paintball guns from the mail and three "silver and gold plated bills."
81. On February 4, 2005, Navarro talked to CI about stealing an MP3 player, palm pilot and speakers the previous night. Navarro also talked about merchandise that co-workers stole the previous night.
82. On February 7, 2005, Navarro told CI that he and V. Sanft stole paintball guns earlier that evening. Navarro told CI he would sell the paintball gun to CI the following day. CI also reported to me that evening that Navarro and other co-workers stole tooth-whitening devices from cargo and that Navarro gave one of the devices to CI, who subsequently gave the device to me as evidence.
83. On February 8, 2005, Navarro talked to various co-workers about needing money and offered to sell CI a paintball gun for \$130. Navarro also stated that he had stolen approximately \$30,000 worth of merchandise while working at NCA, including 20 laptops. Navarro stated that he had taken merchandise that was worth more than a year's salary. Navarro subsequently sold the paintball gun to CI for \$130 cash.
84. On February 8, 2005, UC met Navarro in the NCA parking lot, where Navarro subsequently sold to UC a pocket PC, wireless keyboard and software that had been stolen from the mail for \$180 cash. After selling the merchandise to UC,

Navarro asked UC if he bought laptops and stated that he "took 20 laptops" but "got rid of all of them." Navarro then asked UC if he was interested in paintball guns and said he had three or four of them at his house if UC was interested in them. Navarro then asked UC about his interest in videophones and MP3 players and stated that he could get laptops. Navarro also stated to UC that he got a "lot of stuff" at NCA, "\$20,000 - \$30,000 worth." When UC asked Navarro whether it was mail that he had stolen, Navarro replied, "Mail, cargo, whatever."

85. On February 14, 2005, CI called me to report that he, Navarro and V. Sanft had worked the mail that evening and that Navarro and Sanft had stolen computer parts from the mail. CI said they asked him to be a "lookout" for them while they stole the merchandise and that he agreed to do so to maintain his CI role. CI also reported that he found out that Navarro had stolen a projector from the mail the previous week.
86. On February 15, 2005, Navarro told CI that he wanted to keep a paintball gun he recently stole but had computer equipment to sell. On February 15, 2005, UC met with Navarro inside Navarro's vehicle (CA license plate # 4ASF354), which was parked in the NCA parking lot. Navarro told UC that he had a laptop to sell. Navarro said that he needed rent money and offered to sell a DVD burner and accessories to UC for \$400. Navarro then stated that he had a laptop that was Pentium 4, which he would sell for \$500, and then stated that he would sell everything he had in the "bag right there" for \$900 total. Navarro also commented that he could always get more electronics. Navarro also provided UC with a handwritten list of items that he had available for sale along with prices. The list included a Pentium Processor, Internal DVD Burner, 512 MB Memory Cards and Hard Drive. Navarro told UC that he liked "constant business" and would offer lower prices if the business was constant.
87. On February 19, 2005, CI reported to me that Navarro stole a digital camera from the mail the previous week and planned to sell it to UC.
88. On February 21, 2005, UC made a telephone call to Navarro. Navarro told UC that he no longer had a laptop to sell but had a projector worth \$1,700 and a Canon digital camera worth \$1,500. Navarro offered to sell both items for \$2,000 and said he would include for that price several other items that were in a bag in Navarro's car that he had previously shown to UC.
89. On February 22, 2005, Navarro called UC and stated that he and other co-workers wanted to sell merchandise to UC when he arrived at NCA later that evening and that \$4,000 or \$5,000 might be necessary to buy from everyone. Navarro said, "Everyone has something." Later that evening, UC met with Navarro in the NCA parking lot. Navarro got into his car (CA license plate # 4ASF354) and backed it up next to UC's vehicle. Navarro got out of his car, opened the trunk, and showed UC stolen mail merchandise that was in his trunk. Navarro showed UC a bag containing an Intel microprocessor and DVD burner.

Underneath the bag was a Canon Digital Camera, and Navarro also showed UC a projector. Navarro offered to sell everything for \$2,000, but UC bought only the Canon digital camera for \$600 cash.

90. On February 25, 2005, CI called me to report that Navarro had stolen a digital camcorder from the mail earlier that evening.
91. On February 28, 2005, CI saw V. Sanft and Navarro stealing cameras from cargo. Navarro and V. Sanft opened the boxes, took the cameras out, hid them underneath pallets, and re-taped the boxes to conceal evidence of opening. Navarro talked about taking a whole box and said to "Take one for Chester" (Balmes). Navarro commented that he took at least two cameras. After re-taping the rifled box, Navarro stated "They can't tell it's been opened." Navarro also told CI that he and Balmes had stolen laptops from NCA cargo that evening in addition to the cameras that Navarro and V. Sanft had stolen.
92. On March 4, 2005, CI saw Navarro cut open mail parcels, steal contents including a laptop, video recorder and chocolate cookies, and re-tape the parcels to conceal evidence of tampering. Later that evening, Navarro solicited CI's assistance in taping a stolen laptop to Navarro's body so he could take it out of the warehouse without being seen.
93. On March 7, 2005, UC met with Navarro in the NCA parking lot. Navarro sat in the driver's seat of his car (CA license plate # 4ASF354) and sold a Sony Handycam video camera to UC for \$200 cash. This camera is believed to be the one that Navarro stole on March 4, 2005. Included with the camera that Navarro sold were eight videotapes that Navarro mentioned were "Somebody's recordings."
94. **Arnel Tabangcura Salaver** ("Salaver") works the graveyard shift at NCA. CI told me that Salaver steals U.S. mail while working at NCA.
95. On February 28, 2005, CI's co-workers talked to CI about mail matter that Salaver had previously stolen, including a laptop and two portable DVD players.
96. On March 4, 2005, CI and Salaver discussed merchandise Salaver had previously stolen and sent to the Philippines, including electronics. Salaver also discussed a stolen laptop that he subsequently gave to his mother.
97. On March 25, 2005, I interviewed CI #2, who told me that Salaver was careful and did not steal as often as the rest of the graveyard shift employees. CI #2 told me that Salaver sometimes asked him to set aside mail parcels for him that contained attractive merchandise. CI #2 told me that on one occasion around November 2004, Salaver stole a laptop from the mail and asked CI #2 to take it out of the NCA warehouse for him because he was scared. CI #2 said he hid the laptop under his jacket and walked out to the parking lot with Salaver. CI #2 said

they walked to Salaver's personal vehicle (white Toyota Corolla) and placed the laptop inside. CI #2 said he thought Salaver took the laptop to the Philippines in February 2005.

98. CI #2 stated that he also saw Salaver steal a portable DVD player from the mail around December 2004. CI#2 also told me that on another occasion around December 2004 or January 2005, Salaver found a mail parcel containing a cell phone and asked him to open the box for him. CI #2 said Salaver then stole the cell phone and hid it in his jacket. CI #2 said he also overheard Meehleib and L. Briosos discussing a laptop that Salaver had stolen.
99. CI #2 told me that Salaver had served as a lookout for him and several other co-workers.
100. **Fetongi Mamahi Sanft** ("F. Sanft") works the swing shift at NCA. CI told me that F. Sanft steals mail and cargo. During surveillance that was conducted at NCA by Postal Inspectors and military investigators in December 2004 and January 2005, F. Sanft was observed exhibiting suspicious behavior in the parking lot, including exchanging merchandise with co-workers for cash and concealing merchandise in his clothes while walking to his vehicle. CI also told me that he had purchased a stolen IPOD from F. Sanft.
101. On January 31, 2005, CI talked to F. Sanft about stealing merchandise, and F. Sanft told CI, "I don't fuck with that shit no more," and "I don't like taking stuff no more."
102. On February 12, 2005, CI called me to report that F. Sanft had stolen a laptop computer from the mail on Friday, February 11, 2005. CI reported that F. Sanft wanted to sell the computer to UC.
103. On February 12, 2005, CI called me to report that F. Sanft had stolen chocolate from the mail that evening.
104. On February 15, 2005, F. Sanft asked CI if UC was coming to NCA that day because he brought the stolen laptop to sell. Later that evening, UC met with F. Sanft in the NCA parking lot. F. Sanft sold a stolen Dell laptop to UC for \$550 cash.
105. **Vaea Tangitau Sanft** ("V. Sanft") works the swing shift at NCA. CI told me that V. Sanft steals mail and cargo and was one of three NCA workers who had stolen the highest quantity of mail. During surveillance that was conducted at NCA by Postal Inspectors in December 2004 and January 2005, V. Sanft was observed exhibiting suspicious behavior in the parking lot and NCA warehouse, including intently reading customs declaration forms attached to mail parcels and spending significant amounts of time in the NCA parking lot with other suspects.

106. On January 28, 2005, co-workers told CI that V. Sanft had stolen MP3 players and a "silver bar." On January 31, 2005, CI bought a stolen Kodak digital camera from V. Sanft for \$120 cash. V. Sanft also talked to CI about stealing a PlayStation 2 and trading it with a co-worker for a car amp.
107. On February 1, 2005, V. Sanft talked to CI about stealing watches from the mail and stealing other mail with a co-worker. V. Sanft also commented that there was a digital card inside the PlayStation 2 box that he stole that had not been written on the customs declaration form. Later that evening, V. Sanft sold to CI a Creative MuVo Slim Audio Player and a \$100 Silver Federal Proof Reserve Note for \$100 cash. I subsequently determined that the Silver Proof sold to CI by V. Sanft had been stolen from a parcel containing \$3,500 worth of collectible coins, silver proof notes and other collectible items from the Washington Mint.
108. On February 4, 2005, V. Sanft talked to CI about stealing a paintball gun and jacket and the need to have a "lookout" when stealing. That same evening, V. Sanft met with UC in the parking lot at NCA and sold to UC a stolen Seiko watch for \$120 cash.
109. On February 7, 2005, Navarro told CI that he and V. Sanft stole paintball guns that evening. CI also reported to Inspector Chad Campbell that V. Sanft helped co-worker Sosaia Taelangi steal a plasma monitor from the mail that evening. CI said V. Sanft and Taelangi brought the stolen merchandise to the parking lot dumpster via forklift. CI said they hid the stolen merchandise with garbage to be taken to the dumpster. Upon arrival at the dumpster, the stolen merchandise was placed in a vehicle.
110. On February 8, 2005, V. Sanft talked to CI about wanting to sell stolen merchandise to UC later that night. V. Sanft also commented that he had previously stolen some expensive merchandise including 8 laptops and that in total, he had stolen approximately \$25,000 worth of merchandise.
111. On February 8, 2005, UC met with V. Sanft and Sosaia Taelangi in the NCA parking lot, where V. Sanft sold UC a paintball gun and accessories for \$180 cash. V. Sanft then explained to UC that he and his co-workers handled mail at NCA and that the parcels that they handled had prices on them, which was a reference to the customs declaration form that is attached to each parcel mailed to military personnel in Okinawa. V. Sanft and Taelangi talked to UC about how they almost got caught stealing a monitor the night before. V. Sanft then talked about how they used to have a lot of laptops but that December was the best time, which was a reference to the heavy mail volume around Christmas holiday time. V. Sanft stated "This season right now is not that good. December is the best thing, you can find anything--from digital cameras to freaking laptops to personal computers--everything--to clothes--all brand new." V. Sanft said that he had the best digital camcorder and stated "I took it." V. Sanft then introduced UC to other co-workers who wanted to sell stolen merchandise to UC.

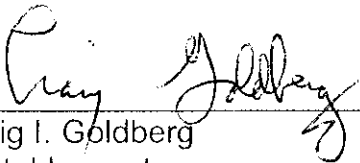
112. On February 14, 2005, CI called me to report that he, Navarro and V. Sanft had worked the mail that evening and that Navarro and V. Sanft had stolen computer parts from the mail. CI said they asked him to be a "lookout" for them while they stole the merchandise.
113. On February 15, 2005, UC met with V. Sanft in the NCA parking lot. V. Sanft sold a stolen Dell laptop to UC for \$550.
114. On February 22, 2005, V. Sanft told CI that he stole two monitors from an "M-1" USPS mail container the previous day and had stolen five MP3 players that day and already sold two of them. V. Sanft then stated, "If they paid us \$18 an hour, no one would be stealing." V. Sanft then discussed stealing 20" and 19" monitors and motorcycle gloves and other co-workers stealing mail. Later that evening, CI talked to V. Sanft and Taelangi, who according to CI had just finished stealing cargo merchandise and were trying to "fix" the straps on the box to conceal the rifling that had taken place. V. Sanft pulled out a stolen object that was hidden underneath a pallet and showed the object to CI, who identified the item as a "Creative" MP3 player. V. Sanft then stated that he gave one to co-worker Po Liang as well. V. Sanft then placed the item back underneath the pallet.
115. On February 22, 2005, UC met with V. Sanft and Taelangi in the parking lot at NCA. V. Sanft told UC that he had two brand new monitors available for sale; a 20" and a 19". When UC told V. Sanft that he did not have any money left, V. Sanft said too many people were coming to the NCA parking lot to sell to UC and that he and UC should meet somewhere else in the future. V. Sanft suggested East Palo Alto where both V. Sanft and Taelangi reside. V. Sanft and Taelangi then talked to UC about graveyard shift employees stealing and sending the stolen merchandise to the Philippines. V. Sanft stated that none of the graveyard shift employees sell what they steal. V. Sanft said "They get it and keep it." V. Sanft asked UC about the price a co-worker wanted to charge for a stolen projector and then stated "I got my monitors here. We can't all come out at once. Jesus (Navarro) says you didn't bring that much money." V. Sanft then asked UC if he buys computer chips because he knows people who will give UC a good deal. V. Sanft said those people are Aeroground employees who work at a different facility, and they have been "doing it for a few years." V. Sanft said one guy sells to the Chinese mafia and suggested that UC compile a list of what he wants and that this guy will get it. V. Sanft said his friend "takes big stuff." V. Sanft then discussed with UC that Aeroground employees steal and said even supervisors steal. V. Sanft and Taelangi then explained that Aeroground employs workers at different facilities all around the airport. V. Sanft said "Everybody over here is dirty."
116. On February 25, 2005, CI reported to me that V. Sanft had stolen a leather jacket from the mail earlier that evening.

117. On February 28, 2005, CI saw V. Sanft and Jesus Navarro stealing cameras from cargo by opening the boxes, taking the cameras out and hiding them underneath pallets, and re-taping the boxes to conceal evidence of opening. V. Sanft talked about hiding items in his jacket. V. Sanft told Navarro that he took two.
118. On March 4, 2005, CI saw V. Sanft cut open mail parcels, steal contents including Air Force One sneakers and clothes, and re-tape the parcels to conceal evidence of tampering.
119. **Sosaia Toviko Taelangi** ("Taelangi") works the swing shift at NCA. CI told me that Taelangi steals mail and cargo. CI said Taelangi was one of three NCA workers who had stolen the highest quantity of mail.
120. On February 4, 2005, UC met with Taelangi in the NCA parking lot, where Taelangi subsequently sold to UC a stolen JVC digital camera for \$280 cash and a Spyder paintball gun for \$120 cash.
121. On February 7, 2005, CI reported to Inspector Chad Campbell that Taelangi stole a monitor from the mail that evening.
122. On February 8, 2005, while getting gas for his vehicle at a gas station on S. Airport Blvd. near NCA, UC saw Taelangi and V. Sanft drive up and approach him. Taelangi asked UC if he had money to spend and showed UC a 20" monitor stolen from the mail. Taelangi said it was "brand spanking new." UC purchased the monitor from Taelangi for \$700 cash. The monitor was determined to be stolen mail matter because there were various USPS markings attached to the box containing the monitor including a Postage Validation Imprinter (PVI) postage strip, insured mail receipt (PS Form 3813-P), USPS priority tape, and sender and addressee information. Taelangi stated that he almost got caught stealing the monitor the previous night.
123. On February 8, 2005, Taelangi talked to CI and other co-workers about the value of merchandise he stole and the fact that he had sold stolen merchandise to UC earlier that day.
124. On February 15, 2005, UC met with Taelangi in the NCA parking lot. Taelangi showed UC a stolen laptop and DVD burner. Taelangi said he would hold onto the merchandise for UC to purchase the following week. Taelangi also apologized to UC for overcharging him on the monitor that UC had previously purchased from Taelangi.
125. On February 19, 2005, CI reported to me that Taelangi had stolen a laptop the previous Thursday and planned to sell the laptop to UC.

126. On February 22, 2005, UC met with Taelangi and V. Sanft in the NCA parking lot. UC inquired about a laptop that Taelangi was going to sell to UC. Taelangi said he gave the laptop to his uncle, so he no longer had it to sell. V. Sanft and Taelangi then talked about graveyard shift employees stealing and sending the stolen merchandise to the Philippines. Taelangi commented that he had a DVD burner to sell. Taelangi told UC that everyone working at Aeroground steals and stated "Ain't nobody clean."
127. **Segundo Bendo Tiongco, Jr.** ("Tiongco") used to work at NCA on the swing shift. CI told me that Tiongco stole mail and cargo. During surveillance that was conducted at NCA by military investigators on December 20, 2004, Tiongco was observed buying a stolen XBOX from CI and placing the XBOX in his vehicle (CA license plate # 3JSU448). CI confirmed to me that he stole the XBOX from the mail and sold it to Tiongco.
128. On February 7, 2005, CI reported that Tiongco had stolen a leather jacket from the mail that evening. CI said Tiongco wanted to keep the jacket and did not plan to sell it.
129. On February 8, 2005, UC met with Tiongco in the NCA parking lot. Tiongco sold to UC a Nikon digital camera, Canon waterproof camera case and computer software for \$260 cash.
130. On February 21, 2005, CI informed me that Tiongco stole four DVDs from cargo on February 20, 2005, and re-taped the rifled box to conceal evidence of tampering. CI said Tiongco let him borrow two of the DVDs, which CI gave to me to copy for evidence purposes.
131. On February 21, 2005, Tiongco talked to CI about stealing a paintball gun and mentioned merchandise that other co-workers had stolen.
132. On February 22, 2005, UC met with Tiongco in the NCA parking lot. Tiongco opened the trunk of his vehicle (CA license plate # 3JSU448) and showed UC a brand new Toshiba laptop, which Tiongco then sold to UC for \$700 cash. I determined on March 9, 2005, that the Toshiba Satellite laptop Tiongco sold to UC (Serial # Y4484774K) had been mailed on February 15, 2005, to Brian Wallace, PSC 480 Box 230, FPO AP 96370. The package was received in Okinawa with the laptop missing.

IV. PROBABLE CAUSE STATEMENT

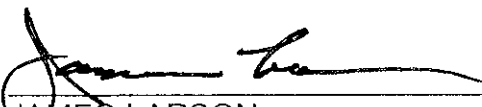
133. Based on my training and experience, as well as the facts presented in this affidavit, I have probable cause to believe that the above-mentioned defendants stole U.S. mail in violation of Title 18, U.S. Code, Section 1708. I have probable cause to believe that the above-mentioned defendants conspired to steal U.S. mail in violation of Title 18 U.S. Code, Sections 371 and 1708.



Craig I. Goldberg
Postal Inspector

Subscribed to and sworn before me:

This 5th day of April 2005



JAMES LARSON
U.S. Magistrate Judge